

1 Leo James Terrell, Esq. (SBN 149693)
2 Tony Su, Esq. (SBN 262323)
3 Law Office of Leo James Terrell
4 11870 Santa Monica Blvd., Ste. 106-673
5 Los Angeles, CA 90024
6 P: (310) 478-3666 / F: (310) 478-3650
7 Email: civil1975@aol.com
8

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

11 LAMONT TARKINGTON,) Case No.: 2:18-CV-07636-CJC-JC
)
12 Plaintiff,) PLAINTIFF’S TO DEFENDANT’S
) OPPOSITION TO EX PARTE
13 vs.) APPLICATION TO ENFORCE
) SETTLEMENT AGREEMENT
14)
15 COUNTY OF LOS ANGELES; LOS)
16 ANGELES COUNTY SHERIFF’S) Date: TBD
17 DEPARTMENT; LOS ANGELES) Time: 1:30 p.m.
18 COUNTY SHERIFF JIM MCDONNELL;) Ctrm.: 9B
19 LAUREN BROWN; JAMES MURREN;) Judge: Hon. Cormac J. Carney
20 DONALD YOUNG; LAWRENCE)
21 BEACH ALLEN CHOI PC; and DOES 1-)
22 10 INCLUSIVE;)
)
Defendants.)

23 PLEASE TAKE NOTICE that Plaintiff LaMont Tarkington (“Plaintiff”) files the
24 following Reply to Defendants’ Opposition to ex parte application to enforce the
25 settlement agreement.

26 Defendants’ stated objections are without merit.

27 First, Defendants’ assertion Plaintiff is attempting to impose deadlines not
28 contemplated by the parties when they entered into the settlement is false. At the time of

1 the settlement, Defendants represented the settlement will be approved in 6-months.
2 Nearly 9-months has elapsed since the settlement and Defendants still has not paid the
3 settlement. Based Defendants' logic, there is no deadline for it to issue payment of the
4 settlement, which is nonsensical.

5 Second, Defendants claim the COVID-19 crisis is responsible for the delay. Yet,
6 Defendants provide no facts to support the claim.

7 Last, Defendants did not respond to Plaintiff's inquire on the status of the
8 settlement payment and only responded after the ex parte application was filed.

9 In sum, Plaintiff requests an Order to compel Defendants to comply with the
10 settlement agreement by paying it forthwith. Otherwise, Defendants will continue to take
11 advantage of the situation and come up with various excuses to not pay the settlement.

12
13 Dated: August 30, 2020

By: /s/ Leo James Terrell
Leo James Terrell, Esq.
Attorneys for Plaintiff,
LaMont Tarkington